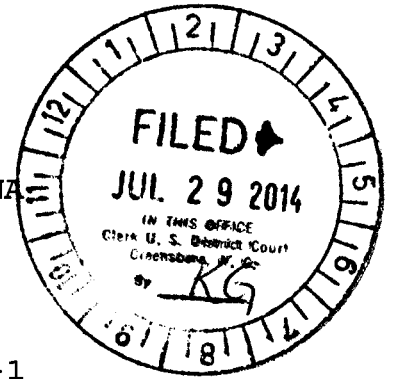


IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA

v.

PABLO MEJIA ZAGADA

1:14CR 300-1

The Grand Jury charges:

COUNT ONE

From in or about March 2001, continuing up to and including on or about November 18, 2010, the exact dates to the Grand Jurors unknown, in the Counties of Durham and Chatham, in the Middle District of North Carolina, and elsewhere, PABLO MEJIA ZAGADA and Ana Laura Callejas-Tirado, also known as Sandra Celso and Sandra Celso Zagada, knowingly, willfully, and unlawfully did conspire, combine, confederate, and agree to commit an offense against the laws of the United States, that is:

To procure or attempt to procure, contrary to law, the naturalization of PABLO MEJIA ZAGADA, a person not entitled to naturalization or citizenship, in violation of Title 18, United States Code, Section 1425(a) and (b).

METHOD AND MEANS

1. It was part of the conspiracy that Ana Laura Callejas-Tirado, also known as Sandra Celso and Sandra Celso Zagada, would assume the identity of Sandra Celso, a native and citizen of

the United States, who had been assigned Social Security number [REDACTED]

2. It was a further part of the conspiracy that PABLO MEJIA ZAGADA and Ana Laura Callejas-Tirado, also known as Sandra Celso and Sandra Celso Zagada, would marry each other under the identities "Pablo Mejia Zagada" and "Sandra Celso."

3. It was a further part of the conspiracy that PABLO MEJIA ZAGADA and Ana Laura Callejas-Tirado, also known as Sandra Celso and Sandra Celso Zagada, would file documents with the government requesting immigration benefits, including naturalization, for PABLO MEJIA ZAGADA.

4. It was a further part of the conspiracy that PABLO MEJIA ZAGADA and Ana Laura Callejas-Tirado, also known as Sandra Celso and Sandra Celso Zagada, would falsely state on these forms that PABLO MEJIA ZAGADA was married to a United States citizen.

#### OVERT ACTS

In furtherance of the aforesaid conspiracy and to effect the objects and purposes thereof, PABLO MEJIA ZAGADA and Ana Laura Callejas-Tirado, also known as Sandra Celso and Sandra Celso Zagada, committed numerous overt acts in the Middle District of North Carolina, and elsewhere including but not limited to the following:

1. Between March 29, 2001, and April 10, 2001, the exact date to the Grand Jurors unknown, in the County of Chatham, in the Middle District of North Carolina, PABLO MEJIA ZAGADA and Ana Laura

Callejas-Tirado, also known as Sandra Celso and Sandra Celso Zagada, sought and obtained an absolute divorce from their marriage to each other under the identities "Pablo Zagada Mejia" and "Ana Tirado Callejas."

2. On or about April 20, 2001, in the County of Chatham, in the Middle District of North Carolina, PABLO MEJIA ZAGADA and Ana Laura Callejas-Tirado, also known as Sandra Celso and Sandra Celso Zagada, filed an application for a license to marry each other under the identities "Pablo Mejia Zagada" and "Sandra Celso."

3. On or about April 23, 2001, in the County of Chatham, in the Middle District of North Carolina, PABLO MEJIA ZAGADA and Ana Laura Callejas-Tirado, also known as Sandra Celso and Sandra Celso Zagada, married each other under the identities "Pablo Mejia Zagada" and "Sandra Celso."

4. On or about April 24, 2001, in the County of Chatham, in the Middle District of North Carolina, PABLO MEJIA ZAGADA and Ana Laura Callejas-Tirado, also known as Sandra Celso and Sandra Celso Zagada, filed a marriage certificate with the Register of Deeds Office of Chatham County, North Carolina.

5. On or about May 10, 2010, in the County of Durham, in the Middle District of North Carolina, PABLO MEJIA ZAGADA submitted immigration form I-485, Application for Naturalization, in person at the national benefits center located at 301 Roycroft Drive in Durham, North Carolina.

6. On or about September 1, 2010, in the County of Durham, in the Middle District of North Carolina, PABLO MEJIA ZAGADA affirmed to an immigration officer that the contents of the immigration form I-485, Application for Naturalization, submitted on or about May 10, 2010, were true and correct.

7. On or about November 18, 2010, in the County of Durham, in the Middle District of North Carolina, PABLO MEJIA ZAGADA swore the oath of allegiance to the United States.

All in violation of Title 18, United States Code, Section 371.

#### COUNT TWO

On or about May 2, 2010, in the County of Durham, in the Middle District of North Carolina, PABLO MEJIA ZAGADA did knowingly subscribe as true under penalty of perjury, under Title 28, United States Code, Section 1746, false statements with respect to material facts in an application or document required by the immigration laws and regulations prescribed thereunder, that is, an application for naturalization, specifically, that his spouse was assigned Social Security number [REDACTED] his spouse was a United States citizen, his spouse had become a citizen at birth, his spouse had only been married one time, and he had never given false or misleading information to a United States government official while applying for any immigration benefit, which statements he then well knew were false, in that his spouse was not assigned Social Security number [REDACTED] his spouse was not a United States citizen, his spouse

had been married on two previous occasions, and he had previously made false statements in applications for immigration benefits; in violation of Title 18, United States Code, Section 1546(a).

COUNT THREE

On or about May 10, 2010, in the County of Durham, in the Middle District of North Carolina, PABLO MEJIA ZAGADA knowingly presented an application for naturalization which contained false statements with respect to material facts, specifically, that his spouse was assigned Social Security number [REDACTED] his spouse was a United States citizen, his spouse had become a citizen at birth, his spouse had only been married one time, and he had never given false or misleading information to a United States government official while applying for any immigration benefit, which statements he then well knew were false, in that his spouse was not assigned Social Security number [REDACTED], his spouse was not a United States citizen, his spouse had been married on two previous occasions, and he had previously made false statements in applications for immigration benefits; in violation of Title 18, United States Code, Section 1546(a).

COUNT FOUR

On or about September 1, 2010, in the County of Durham, in the Middle District of North Carolina, PABLO MEJIA ZAGADA did knowingly make a false statement under oath in a case, proceeding, and matter relating to, under, and by virtue of a law of the United States

relating to naturalization and citizenship, that is, that the information contained in the immigration form I-400, Application for Naturalization, he submitted was true and correct; in violation of Title 18, United States Code, Section 1015(a).

COUNT FIVE

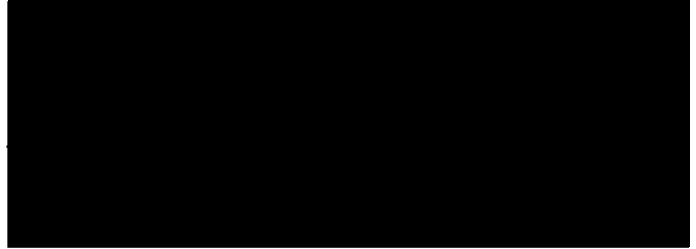
Between on or about September 1, 2010, continuing up to and including on or about November 18, 2010, the exact dates to the Grand Jurors unknown, in the County of Durham, in the Middle District of North Carolina, PABLO MEJIA ZAGADA knowingly attempted to procure and procured naturalization and citizenship for himself contrary to law, by making material misrepresentations regarding his spouse's true identity and citizenship; in violation of Title 18, United States Code, Section 1425(a).


COUNT SIX


From on or about September 1, 2010, continuing up to and including on or about November 18, 2010, the exact dates to the Grand Jurors unknown, in the County of Durham, in the Middle District of North Carolina, PABLO MEJIA ZAGADA knowingly applied for, attempted to procure, procured, and obtained naturalization and citizenship

for himself, a person not entitled to naturalization or citizenship;  
in violation of Title 18, United States Code, Section 1425(b).

A TRUE BILL:



  
\_\_\_\_\_  
KYLE D. POUSSON  
SPECIAL ASSISTANT UNITED STATES ATTORNEY

  
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RIPLEY RAND  
UNITED STATES ATTORNEY